



RE: Inspection Report 
Greg Gehrig to: Kapellen, Paul

01/16/2013 12:38 PM

Paul,

Thank you for your comments. We do not typically change reports once issued, but I will keep this email with the report in the file for clarification purposes.

Greg

"Kapellen, Paul"

Greg: I have the following corrections and additi...

01/16/2013 10:00:38 AM

From: "Kapellen, Paul" <pkapellen@brillionironworks.com>
To: Greg Gehrig/R5/USEPA/US@EPA,
Date: 01/16/2013 10:00 AM
Subject: RE: Inspection Report

Greg:

I have the following corrections and additions for your inspection report:

1. **Process Description** – Plant 1 melting adds the magnesium at 2 inoculation stations (similar to Plant 2) instead of during the melting process and has its own baghouse. The magnesium inoculation is not collected by the melting baghouse.
2. Operation of the furnaces is controlled by an electrical demand controller to limit total electric demand to preset levels.
3. Five of the Plant 1 furnaces have a 6.2 tons per hour maximum throughput capacity not 10 tph melt capacity and one furnace has 8.85 tons per hour maximum throughput capacity not 10 tph melt capacity.
4. The Plant 1 DISA 2070 molding, pouring, cooling and shakeout is controlled by two baghouses.
5. In Plant 1 we have the following baghouses:
 - A. Melting Baghouse – collects emissions from charging, melting and preheating
 - B. Inoculation baghouse
 - C. DISA 2070 – uses 2 baghouses to collect the emissions from molding, pouring, cooling and shakeout
6. Construction update – The construction of the additional baghouse in Plant 2 for the BMD Line has been completed and is operating. This baghouse facilitates control of indoor emissions from the BMD mold cooling and reduces fugitive emissions and has made a considerable improvement in the air quality in Plant 2.
7. As in Plant 1, operation of the furnaces is controlled by an electrical demand controller to limit total electric demand to preset levels.
8. The two holding furnaces in Plant 2 have a capacity of 50 tons and 65 tons.
9. It was formaldehyde (not benzene) emission testing in Plant 1 in 2007 where there was an issue.
10. The machining operations at Plant 3 have been shutdown and most of the machines have been removed. Painting operations remain.
11. Plant 4 grinding and finishing operations are controlled by three baghouses and vented to the atmosphere.
12. **Facility Tour** - The Plant 1 furnace fume collector stopped working when we were on the melt deck. After investigating, it was determined that the fume collector suddenly shutoff. It is unknown why the fume collector suddenly shutoff as this is extremely rare. When the fume

collector shutoff a melt deck employee notified the maintenance department immediately to have them investigate. The Plant 1 melting fume collector was turned back on within a few minutes. There were no melting operations at that time due to a down time on the Plant 1 DISA 2070 Molding Machine. In addition, the Plant 1 scrap iron conveying system shuts down in the event the Plant 1 melting fume collectors shut off.

13. High pressure was highlighted in the monitor screen for the IVI dust collector. After investigating, it was determined that there was build-up of dust on the dust collector bags – a condition that can occur at anytime. If the pressure would get too high it would automatically shut the process down. The collector was “pulsed down” to clean the bags.
14. High pressure light was lit for the Plant 2 furnace fume collector. While investigating it was determined that our maintenance department was aware of this problem and were in the process of ordering parts. Again, if the pressure gets too high, it would automatically shut the process down and set off an alarm

Please make these changes.

Thank you,

Paul Kapellen

Environmental Technician
Brillion Iron Works, Inc.
200 Park Avenue
Brillion, WI 54110
Phone: (920) 756 - 6372
FAX: (920) 756 - 3550
pkapellen@brillionironworks.com

From: Gehrig.Greg@epamail.epa.gov [mailto:Gehrig.Greg@epamail.epa.gov]

Sent: Tuesday, January 15, 2013 7:52 AM

To: Kapellen, Paul

Subject: Inspection Report

Hi Paul,

Attached is a copy of the report for the inspection at Brillion Iron we conducted last November.

If you have any questions, please let me know.

Greg

CONFIDENTIALITY NOTICE: This message (including attachments) is covered by the United States Electronic Communication Privacy Act, 18 U.S.C. sections 1510-2521 and various similar acts and laws worldwide, is CONFIDENTIAL, and constitutes non-public information intended to be conveyed only to the designated recipient(s). Additionally, this message may be protected by the ATTORNEY-CLIENT or other PRIVILEGE. If you are not an intended recipient, please delete this e-mail, including attachments, and notify me. The unauthorized use, retention, dissemination, distribution or reproduction of this e-mail, including attachments, is prohibited and may be unlawful.